

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of The)
Empire District Electric Company for a)
Certificate of Convenience and)
Necessity Related to its Customer)
Savings Plan)

Case No. EA-2019-0010

STAFF'S WRITTEN CROSS EXAMINATION QUESTIONS

COMES NOW Staff Counsel and for its cross examination of Division of Energy's witness Martin Hyman asks as follows:

1. What is your understanding of provision 17(a) in the Non-Unanimous Stipulation and Agreement?
2. Please briefly explain the employee protections in the IBEW #1474 agreement.
3. In your opinion, how do the inclusion of provision 17 (a) and the other terms and conditions of the Non-Unanimous Stipulation and Agreement align with the interests of the Division of Energy?
4. In your opinion, how do the inclusion of provision 17(a) and the other terms and conditions of the Non-Unanimous Stipulation and Agreement promote the public interest?

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

Deputy Counsel

Missouri Bar No. 66766

P.O. Box 360

Jefferson City, MO 65012

(573) 751-6651 (Telephone)

(573) 751-9285 (Fax)

Nicole.mers@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of April, 2019.

/s/ Nicole Mers